

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Consumer Financial Protection Bureau,

Plaintiff,

v.

Navient Corporation, *et al.*,

Defendants.

Case No. 3:17-CV-00101-RDM
(Hon. Robert D. Mariani)

ELECTRONICALLY FILED

**PLAINTIFF’S CONSENT MOTION FOR ENTRY OF
STIPULATED FINAL JUDGMENT AND ORDER**

Plaintiff Consumer Financial Protection Bureau respectfully requests that the Court enter the proposed Stipulated Final Judgment and Order, attached as Exhibit A, for the following reasons:

1. The parties have reached an agreement, set forth in the terms of the proposed Stipulated Final Judgment and Order, to resolve Plaintiff’s claims against Defendants.
2. Entry of the proposed Stipulated Final Judgment and Order is a fair resolution of this case, is in the public interest, and promotes judicial economy.

As required by Local Rule 7.1, Counsel for the Plaintiff certifies that Defendants concur with this motion and consent to the entry of the proposed Stipulated Final Judgment and Order.

Dated: September 12, 2024

Respectfully submitted,

Eric Halperin
Enforcement Director

David Rubenstein
Thomas Kim
Deputy Enforcement Directors

/s/ Nicholas Lee
Nicholas Lee, DC 1004186
(Nicholas.Lee@cfpb.gov; 202-435-7059)
Carl Moore, MD 0912160268
(Carl.Moore@cfpb.gov; 202-435-9107)
Tracee Plowell-Page, NY 2994457
(Tracee.Plowell@cfpb.gov; 202-435-9861)
Christopher Sousa, CA 264874
(Christopher.Sousa@cfpb.gov; 202-435-9809)
Katherine Wong, CA 264056
(Katherine.Wong@cfpb.gov; 202-435-7638)
Enforcement Attorneys

1700 G Street NW
Washington, DC 20552
Fax: 202-435-9346

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that on September 12, 2024, I filed the foregoing document with the Court's ECF system, which will send notification of such filing to counsel for Defendants.

/s/ Nicholas Lee
Nicholas Lee, DC 1004186
Nicholas.Lee@cfpb.gov
1700 G Street NW
Washington, DC 20552
Phone: 202-435-7059
Fax: 202-435-9346

Attorney for Plaintiff